

From: Ex. 6 Personal Privacy (PP)
Sent: 9/14/2021 6:29:12 PM
To: Ex. 6 Personal Privacy (PP)
Subject: Implementing a QA step to RESs

Raising item #1 below for further discussion, since you considered it a major issue.

Unlike the others, I believe there is a need to QA the RES. I haven't been able to do so recently because of my priority on green fuel matters. Obviously, that situation w/ Ex. 6 Personal Privacy (PP) highlights the need for a QA step. Maybe just have the ERGer who does the QA of the IRER also do a QA of the RES. If there isn't a ERG QA for a given case, ERG would pick someone to do the RES QA. Their initials would be added to the string of initials in the RES header (Ex. 6 Personal Privacy (PP))

From: Ex. 6 Personal Privacy (PP)
Sent: Tuesday, May 18, 2021 7:39 AM
To: Ex. 6 Personal Privacy (PP)
Cc: Ex. 6 Personal Privacy (PP)
Subject: RE: Draft: Engineering Work Plan

Comments are in red.

From: Ex. 6 Personal Privacy (PP)
Sent: Monday, May 17, 2021 3:18 PM
To: Ex. 6 Personal Privacy (PP)
Cc: Ex. 6 Personal Privacy (PP)
Subject: Draft: Engineering Work Plan

Hello All

Engineering team held discussion today, Ex. 6 Personal Privacy (PP) had personal conflict to attend but provided his feedback via e-mail. Below are my notes from discussion, please add/edit and provide your feedback **by noon tomorrow**. Once its through team's circulation, we will prepare response for management based on it.

1. **Release and Exposure Summary:** Team discussed and decided to outsource it to ERG. Engineering report for the case goes through complete review by EPA, in case if any error occurs on RES that would be addressed by NCD engineer during the detail review of the case, before any determination. Hence, this is an internal product which does not directly affect determination of the case, its purpose is limited to initial feedback to other disciplines during the early stage of NC review. Thus, team does not think that RES needs any QA by EPA. I am not comfortable sending any work product, for which I am responsible, outside of engineering that I have not reviewed. I will review the contractor's draft and then place it into its final location on the CBI LAN.
2. **Prescreening of Submission:** While team developed a plan to outsource it but in the meantime we found that submitter are notified both for rejection as well acceptance of submission. In such case, NCD engineers would have to QC for all the prescreened cases by ERG. LOE for the QC is expected to be in the same order of magnitude as doing the pre-screening. Hence, I am not sure of we really free up NCD engineers time by outsourcing it. Ex. 6 Personal Privacy (PP) please correct me, if your think differently.
3. **Case Priority:** For Initial review L ranks ahead of P for priority, as always. Team believes that we do not have any bandwidth to support any back log cases any more. Team suggests backlog cases are restricted to ULTRA SUPER HIGH All-Hair on Fire (☺) cases. In such situation, delay to the initial reviews should be accounted at the time of the request.
4. **Additional QC by Contractor:** Team sees high values in this idea but parked it to develop further, since we have past examples indicating simply adding another checklist is less likely to get to what we want from this initiative.

I will continue the approach that I have been taking w/ ERG in this regard and may independently further develop that approach.

5. **Updating Various Engineering Rotation:** [REDACTED] is working on updating different rotation for team with fewer member

Thanks

From: [REDACTED] **Ex. 6 Personal Privacy (PP)**
Sent: Thursday, May 13, 2021 9:55 AM
To: [REDACTED] **Ex. 6 Personal Privacy (PP)**
Cc: [REDACTED]
Subject: Request--FW: Note for Management Regarding Exposure

Hi,
Please work with the engineering team to prepare a similar email to be sent to the NCD management team.
I would like you to send it to the NCD management team next week.
Let us know if you would like a short conversation to clarify questions/issues.

[REDACTED] **Ex. 6 Personal Privacy (PP)**

US EPA's New Chemicals Division
Washington DC, 20460

[REDACTED] **Ex. 6 Personal Privacy (PP)**

From: [REDACTED] **Ex. 6 Personal Privacy (PP)**
Sent: Wednesday, May 12, 2021 3:03 PM
To: [REDACTED] **Ex. 6 Personal Privacy (PP)**
Cc: [REDACTED] **Ex. 6 Personal Privacy (PP)**
Subject: Note for Management Regarding Exposure

Good afternoon,

Based on the current staff changes (i.e., details, extended leave, vacation/sick leave), the exposure team will be facing shortages in staff. The team has discussed coverage options to ensure smooth transitions. [REDACTED] has deployed for her HHS detail, which may last up to 120 days. I will be going on extended leave for 3 months, starting in July. Based on these changes, we will be a total of 3 exposure assessors until July and 2 exposure assessors after that. These are the changes we have discussed as a team to ensure coverage:

1. [REDACTED] **Ex. 6 Personal Privacy (PP)** will be covering [REDACTED]'s exposure rotation every other Wednesday (starting today) in addition to attending the scoping meeting accordingly. This has been updated in the new chemical confluence calendar and the exposure outlook calendar. Exposure rotations occur every Wednesday and Friday. In July, [REDACTED] **Ex. 6 Personal Privacy (PP)** will cover both [REDACTED] and my exposure rotations every Wednesday in addition to their Friday rotations until [REDACTED] and I return. Scoping meeting attendance will be covered accordingly as well. In the case there may be a lapse in coverage due to annual/sick leave, resources from our contractor VERSAR will be used to provide extra QA/QC support upon request. [REDACTED] has drafted and submitted a technical directive for extra PMN support from VERSAR and the team can use these extra resources if needed. All exposure cases will still be reviewed and approved by an EPA exposure assessor.

2. The exposure team has robust SOPS/guidance documents that will facilitate the completion of the IRExRs and ensure training of any new staff techniques. We will guide VERSAR more of our QA/QC processes to continue to ensure quality deliverables despite the shortage.
3. There may be days when exposure is unable to complete all the cases on time and will need to delay cases. In this situation, the team will prioritize L cases, and will notify [REDACTED] and the appropriate staff on these delays. -

This is a situation that we will be reevaluating with branch chiefs/team leads and the exposure team will work to make the proper adjustments as needed. We are willing and able to meet with the management team to discuss any questions/comments.

Thank You!

[REDACTED]
Ex. 6 Personal Privacy (PP)

New Chemicals Division, Risk Assessment Branch 1
U.S. EPA | Office of Chemical Safety and Pollution Prevention | Office of Pollution Prevention and Toxics
1200 Pennsylvania Ave., NW, M/C 7403M, Washington, D.C. 20460

[REDACTED]
Ex. 6 Personal Privacy (PP)